

I request the FCC reject RM-11306! at least for the present time, leave the present band allotments as they are. This is especially true for HF spectrum. VHF is a great place to experiment. VHF / UHF and above has plenty of band space to experiment in, once it's proven to work , migrate it to HF. If HF spectrum is needed to experiment in, why not assign, say, 20kHz on a few amateur bands (see note 1) , where digital technologies could be tested. If that produces something new that benefits amateur radio, then change the rules to allow it elsewhere in the bands.

Note 1: Just as a suggestion, I would allot the following bandwidth segments for experimental tests, starting 25kHz below the present phone bands.

20kHz, mid range in the 160Meter band

20kHz 80/75M & 40 meter bands

50kHz 15 meter band

20kHz 17 meter band

100kHz 10 meter band (28.9 to 29.0)

No segment on 20, 30, or 12 meters

These are general beginning point suggestions, probably more thought should go into the width and placement of these band segments. And as to "where and what" to do on VHF/UHF bands.

Within these segments, any bandwidth would be permitted, that would remain within the segment..

Listed below are several reasons supporting my decision.

1. It seems the intent of RM-11306 is to make it easier to experiment with new modes, and the need for wider bandwidth to accommodate faster digital communications. Why we need faster communications, completely escapes me. *We should be striving for less bandwidth* to accommodate more users, not more bandwidth for fewer users. Just exactly what data do we need to transmit so fast ?

One fact is apparent at this time in the evolution of digital communications ***faster = wider***. Maybe, sometime in the future, some great breakthrough will change this constant. When that happens, I am sure, the FCC will change with the times. But at right now there doesn't appear to be any breakthroughs on the radar screen ! There could be someday, but not today.

2. I hope Amateur Radio never becomes "just " an extension of the internet. The use of uncontrolled "robots" with the sole intent of relaying internet email and other information, to folks on yacht's at sea, or in motor homes cruising the USA, is not the intent of amateur radio. It appears that RM-11306 is an attempt to accommodate more of this type of operation

3. I am a ARRL member, but that doesn't imply they speak for me or the entire amateur radio community! (A) I disagree with their idea the FCC is too slow to

react. (B) I also disagree with their statement, that, “we are in the early stages of a dramatic shift in amateur operation patterns.” If so , what? (C) And who decided that “it is now necessary to permit higher data rates, in order to permit the development of digital multimedia technology, which is now coming into use in the amateur radio service, and which has great promise for improving and fostering more effective emergency and disaster relief communications.” What are they talking about, maybe a QSO with Napster to download to my Ipod ?? What smoke & mirrors !!

Please deny RM11306. A Possibly alternative would be to implementing some minor changes to accommodate experimentation, let the experimenters prove their techniques in limited HF band segments, or on VHF / UHF bands.
I have seen no evidence or occasion where the present band allotments have held back any breakthrough technology.

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